

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

Christopher Morales and Mary	§	
	§	
Helen Morales	§	
	§	
<i>Plaintiffs,</i>	§	Civil Action No:
	§	
v.	§	5:22-cv-00527-XR
	§	
Specialized Loan Servicing, LLC	§	
	§	
<i>Defendant.</i>	§	

Plaintiffs' Original Reply to Defendant's Counterclaim

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In its answer to Plaintiffs' original petition Defendant asserts a counterclaim. The paragraphs under the heading "Counterclaim" are numbered 19, 22, and 24. Plaintiff replies per the Defendant's numbering:

**Paragraph 19:**

**Reply:** Plaintiffs deny this case is frivolous. Plaintiffs deny that there is a cause of action in its suit designed to stop a foreclosure proceeding. Plaintiffs deny that this is their attempt to stop foreclosure without a legitimate basis to sue Defendant. Plaintiffs deny the their pleadings violate Civ. Prac. & Rem. Code §§ 3.011 et seq. and 10.001 et seq. Plaintiffs deny their pleadings are

groundless or brought in bad faith, brought for the purpose of harassment or interposed for an improper purpose such as to cause unnecessary delay and/or needlessly increase the cost of litigation.

**Paragraph 22:**

**Reply:** Plaintiffs deny they filed a groundless lawsuit to delay Defendant's right to foreclose and take possession of its collateral following default. Plaintiffs admit that they continue to possess the Property. Plaintiffs admit that they have not made payments on the second mortgage at issue in this litigation for the reasons established in their state court case and amended complaint.

**Paragraph 24:**

**Reply:** Plaintiffs are not required to admit or deny the content of the Note and Security Instrument as these documents speak for themselves. Plaintiffs admit that Defendant has requested the recovery of its reasonable and necessary attorney's fees, witness fees, costs, fees of experts, and deposition fees.

Dated: June 14, 2022

Respectfully submitted,

/s/William M. Clanton  
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